

**ABRAMSON & DENENBERG, P.C.**  
**BY: ALAN E. DENENBERG, ESQUIRE**  
**IDENTIFICATION NUMBER: 54161**  
**1200 WALNUT STREET**  
**SIXTH FLOOR**  
**PHILADELPHIA, PA 19107**  
**(215) 546-1345**

**ATTORNEY FOR PLAINTIFF**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARLES GROSSMAN**

**VS.**

**CITY OF PHILADELPHIA**

AND

**COMMISSIONER JOHN TIMONEY**

AND

# CAPTAIN JOHN DOE

AND

**LIEUTENANT JOHN DOE**

AND

**SERGEANT JOHN DOE**

AND

**POLICE OFFICERS JOHN DOE #1-2**

AND

**POLICE OFFICER EMORY**

**BADGE #7531**

## ORDER

**AND NOW**, this            day of            2004, after consideration of Plaintiff's counsel's Motion to Withdraw as counsel in the above captioned matter and any response thereto, it is hereby **ORDERED** that said Motion is **GRANTED** and Plaintiff's counsel, Alan E. Deneberg, Esquire is hereby withdrawn as counsel for the Plaintiff.

J.

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[illegible]

## CIVIL ACTION

**NO. 02-CV-4484**

**MOTION OF PLAINTIFF'S COUNSEL FOR  
LEAVE TO WITHDRAW AS COUNSEL**

Alan E. Denenberg, Esquire hereby motions the Court for Leave to Withdraw as Counsel to the Plaintiff in the above-captioned matter. In support of this Motion, Mr. Denenberg avers the following:

1. Petitioner was retained by plaintiff to represent him in a civil rights action alleging police misconduct and various violations of his constitutional rights.
2. Petitioner has worked diligently since being retained by plaintiff and taken every step to preserve plaintiff's rights.

3. After discussing the case with the Plaintiff, counsel has learned that the Plaintiff has what counsel considers a very unreasonable expectation of the value of the case, which unreasonable expectation has made it impossible for counsel to even approach defendants regarding the settlement of the case.

4. After several conversations in which counsel unsuccessfully tried to reason with the client, on October 29, 2003 counsel sent the client a letter stating that in light of the irreconcilable difference of opinion regarding the value of the case, counsel thought it would be in everyone's best interest if the Plaintiff retained new counsel. Exhibit "A".

5. Subsequent to the October 29, 2003, the Plaintiff requested that counsel send him the entire file and a bill for copying the file, which was done on November 20, 2003. Exhibit "B".

6. Plaintiff has had ample time to retain new counsel.

9. As a result of these irreconcilable differences between the plaintiff and counsel, counsel requests that this Honorable Court grant his Motion for leave to withdraw as counsel of record for plaintiff.

**WHEREFORE**, Petitioner respectfully requests that the Court grant the instant Motion for Leave to Withdraw and enter the proposed Order accompanying the Motion.

ABRAMSON & DENENBERG, P.C.

Date: February 11, 2004

BY: \_\_\_\_\_  
ALAN DENENBERG, ESQUIRE  
ATTORNEY FOR PLAINTIFF

**ABRAMSON & DENENBERG, P.C.**  
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## CERTIFICATE OF SERVICE

I, Alan E. Denenberg, Esquire, hereby certify that on February 11, 2004, I served a true and correct copy of Plaintiff's Counsel's Motion for Leave to Withdraw as Counsel in the above captioned matter via First Class Mail, Postage Prepaid, on the following:

Robin B. Arnold, Esquire  
Deputy City Solicitor  
Law Department  
One Parkway  
1515 Arch Street  
Philadelphia, Pa 19102-1595

Mr. Charles Grossman  
712 Pennsylvania Ave.  
Fort Washington, PA 19034

Date: February 11, 2004

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ALAN E. DENENBERG, ESQUIRE